

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

JULIAN PEREZ,

Plaintiff,

v.

NEW BREED LOGISTICS, INC.,

Defendant.

§  
§  
§  
§  
§  
§  
§  
§  
§

Civil Action No. 2:16-cv-00127

**JOINT STIPULATION OF DISMISSAL**

TO THE HONORABLE JUDGE OF SAID COURT:

Pursuant to Rule 41(a) of the Federal Rules of Civil Procedure, Plaintiff and Defendant file this Joint Stipulation of Dismissal in the above-styled and numbered matter and show as follows:

1. The parties request that the Court dismiss this action because the parties have compromised and settled all alleged claims and controversies causing the suit to be filed.

2. For these reasons, the parties ask the Court to take notice of this Joint Stipulation of Dismissal and to dismiss this action against Defendant, with prejudice, and for such other relief, at law or in equity, to which the parties may be justly entitled.

Respectfully submitted,

/s/ Adriaan T. Jansse (w/permission)

Adriaan T. Jansse, MD, JD  
S. Dist. No. 566674  
Texas Bar No. 24043740  
CAVARETTA, KATONA  
& LEIGHNER, PLLC  
One Riverwalk Place  
700 N. St. Mary's Street, Suite 1500  
San Antonio, Texas 78205  
210.588.2901 – Telephone  
210.588.2908 – Facsimile

**ATTORNEY FOR PLAINTIFF**

/s/ Raven R. Applebaum

Lara Cardin de Leon  
Texas Bar No. 24006957  
S. Dist. No. 358139  
Raven R. Applebaum  
Texas Bar No. 24043644  
S. Dist. No. 1117871  
OGLETREE, DEAKINS, NASH, SMOAK  
& STEWART, P.C.  
112 East Pecan Street, Suite 2700  
San Antonio, TX 78205  
210.354.1300 – Telephone  
210.277.2702 – Facsimile

**ATTORNEYS FOR DEFENDANT**

**CERTIFICATE OF SERVICE**

I hereby certify that on March 16, 2018, I electronically transmitted the foregoing pleading, using the CM/ECF system of filing, which will transmit a Notice of Electronic Filing to the following counsel of record:

Adriaan T. Jansse  
Cavaretta, Katona & Leighner, PLLC  
One Riverwalk Place  
700 N. St. Mary's Street, Suite 1500  
San Antonio, Texas 78205

/s/ Raven R. Applebaum

Lara Cardin de Leon / Raven R. Applebaum

33339580.1